

Fruitland Magnesium Fire Site
Removal Plan

1. Termination of ER Phase: The return of the Resident Information packages will delineate the end of the ER phase activities and termination of the Unified Command structure.
2. Site Cleanup Strategy: EPA is currently pursuing an enforcement strategy through CERCLA 104(e) information requests to determine PRP(s) ability to pay and a property lien. EPA is anticipating that the PRPs will not have the financial resources to complete the removal. Concurrently, EPA is preparing for a fund-lead removal action at the site through an AM ceiling increase and \$2 million exemption request.
3. EPA Fund-Lead Removal Action: Early October, pending funding approvals. Approx. 7 weeks in duration.
 - EPA will be the lead for Community Involvement (CI) during the removal action. A “next steps” fact sheet describing the removal action planning will be prepared for distribution immediately following the delivery of Resident Information packages. An initial “removal start” fact sheet will be prepared once a start date can be determined and thereafter weekly “progress” fact sheets will be prepared. During the removal action EPA CI will be focused on the residents of properties that border/are adjacent to the PIT property. EPA CI staff will liaise with LA County DPH to share information and DPH may pass information along to the broader community as part of their general health outreach activities.
 - Initial actions at the site will be to stabilize the existing roof structure above the loading dock area and to construct a debris barrier along the property border with the residential properties to the south. The structural engineering evaluation performed during the ER phase determined that the roof structure was unsafe and a demolition plan was commissioned. Subsequently, the structural engineer revised the initial determination and has recommended that shoring of the structure at one corner will create safe working conditions. This is preferable to demolition from a cost/time savings perspective and because the roof demolition would likely need to be performed prior to the removal of debris and contaminated ash/soil, which could result in unacceptable particulate dust generation. The construction of a debris barrier along the southern property border is intended to mitigate potential debris/particulate migration onto the residential properties and to minimize disruption to the residents from visual/noise impacts of removal operations.
 - The first phase of removal activities will consist of solid waste/building debris removal. CalRecycle has the authority to address solid wastes at co-disposal sites and discussions regarding state involvement with solid waste transportation and disposal are ongoing. As areas of the property are cleared of solid waste additional assessment of the surface/subsurface will be conducted to more fully characterize the extent of contamination. EPA will institute strict dust control measures and an air monitoring/sampling program to ensure that removal activities do not create health risks for neighboring residents.
 - The second phase of activities will be to remove contaminated ash/soils. Cleanup goals for the site will be consistent with the national removal program directives of the 10^{-4} risk range based on the RSLs for Industrial Soils (developed in consultation with an EPA Region 9 Toxicologist) or 3 feet below ground surface (bgs) maximum excavation depth. Confirmation sampling will be conducted to document achievement of the cleanup goals and/or any contamination that remains at the 3 foot bgs maximum excavation depth. If contamination above a cleanup goal is present, then a soil sealant will be applied to stabilize the site pending future remedial action. These actions will complete the extent of the EPA Removal Program activities. Remedial actions at the site, if required, can be pursued through local/state enforcement programs or referral to the EPA Remedial Program.